

EMERGENCY RESPONSE REPORT

FOR

BRENNTAG SOUTHWEST

11344 PLANO RD

DALLAS, DALLAS COUNTY, TEXAS

Prepared for

U.S. Environmental Protection Agency Region 6

Linda Carter, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

Contract No. 68-W-01-005
TDD No. 06-04-04-0013
WESTON W.O. No. 12632.001.300.0475.01
NRC No. 719757
CERCLIS No. N/A
FPN N/A
EPA OSC Greg Fife
START-2 FTL Heth Parnell

Submitted by

Weston Solutions, Inc.
Robert Beck, P.E., Program Manager
70 NE Loop 410, Suite 460
San Antonio, Texas 78216
(210) 308-4300

24 May 2004

PROJECT SUMMARY

This final report describes the U.S. Environmental Protection Agency (EPA) response actions at Brenntag Southwest, Inc., a chemical distribution facility. The site is located at 11344 Plano Road, Dallas, Dallas County, Texas. The detailed report follows this page, and all attachments are provided as separate portable document format (PDF) files. On 24 April 2004, a representative with Brenntag Southwest, Inc. notified the National Response Center (NRC No. 719757), and the NRC notified the EPA Region 6 Response and Prevention Branch (EPA-RPB) of a multi-chemical spill at the facility. The chemicals released included flammable solvents and oxidizers, creating a high risk of fire and explosion. The chemicals flowed downgradient (south) into a stormwater collection containment area on-site. The Superfund Technical Assessment and Response Team (START-2) was activated by the EPA-RPB to respond to the site and to initiate relevant response activities. START-2 members Danette Parnell and Heth Parnell arrived at the facility on 24 April 2004, and Jim Kerlin with the Texas Commission on Environmental Quality (TCEQ) was also on-site. The EPA START-2 tasks included responding to the spill incident; defining the cause, nature, and extent of contamination; and providing written and photographic documentation of response activities. Response activities conducted by Brenntag Southwest, Inc., the potentially responsible party (PRP), and by their cleanup contractor, AMX, resulted in the recovery of approximately 70,000 gallons of the chemical-rainwater mixture. After observing cleanup activities by the PRP and PRP-led contractor, EPA On-scene Coordinator (OSC) Greg Fife released START-2 from the site on 24 April 2004.

Weston Solutions, Inc. under Contract No. 68-W-01-005 prepared this final report for EPA Region 6. The EPA OSC was Greg Fife, and the Superfund Technical Assessment and Response Team (START-2) Field Team Leader was Heth Parnell.



The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.



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EMERGENCY RESPONSE REPORT

PROJECT SUMMARY

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1. PROJECT IDENTIFICATION

Date: 24 May 2004

To: Greg Fife, On-scene Coordinator (OSC)
U.S. Environmental Protection Agency (EPA)
Region 6, Response and Prevention Branch

Through: Linda Carter, Project Officer (PO)
EPA Region 6, Program Management Branch

Through: Robert Beck, P.E., Weston Solutions, Inc. (WESTON®)
EPA Region 6, Superfund Technical Assessment and Response Team (START-2)
Program Manager

From: Heth Parnell, WESTON
EPA Region 6, START-2 Field Team Leader

Subject: Emergency Response: Brenntag Southwest, 11344 Plano Road, Dallas,
Dallas County, Texas
TDD No. 06-04-04-0013
W.O. No. 12632.001.300.0475.01
NRC No. 719757
FPN N/A
CERCLIS ID N/A
Latitude 32.90335° North
Longitude 96.70053° West

Geographic coordinates of the facility were determined by START-2 members using the hand-held Global Positioning System (GPS) based on the North American datum-83 with accuracy estimated at +/- 14 feet circular probable error.

2. INTRODUCTION

On 24 April 2004, Jerry Hill with Brenntag Southwest, Inc., the potentially responsible party (PRP) and a chemical distribution facility, notified the National Response Center (NRC No. 719757) of a multi-chemical spill. The NRC notified the EPA Region 6 Response and Prevention Branch (EPA-RPB), and at 1900 hours, the EPA-RPB notified WESTON, the EPA Region 6 START-2, to perform a response investigation and to initiate relevant response activities. According to Brenntag representatives, vandals entered the chemical distribution facility during the early morning of 24 April 2004 and released several chemicals including

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flammable solvents and oxidizers, creating a high risk of fire and explosion. Severe storms and heavy rain impacted the area during the night of the incident. The chemical-rainwater mixture pooled at the south end of the property in a stormwater collection area. The Operations Manager for Brenntag Southwest, Inc., Andy Medina, reported an undetermined amount of chemicals were released off-site through a breach in the facility containment wall. The chemicals released off-site flowed into a storm drain located to the south of the facility along the light rail right-of-way. At the time of this report, results of an incident investigation are pending.

3. BACKGROUND

The facility is located in an industrial area at 11344 Plano Road, Dallas, Dallas County, Texas. A mass transit light rail line is located directly to the south. The chemicals and quantity of each reportedly released were the following: hydrogen peroxide (50%), 1,000 gallons; acetone, 5,700 gallons; mineral spirits, 1,400 gallons; toluene, 2,400 gallons; ethylene glycol ether, 3,600 gallons; potassium hydroxide, 930 gallons; and methylene chloride, 5,400 gallons. No injuries or evacuations were reported.

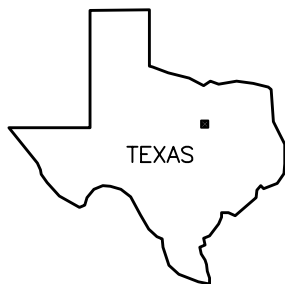
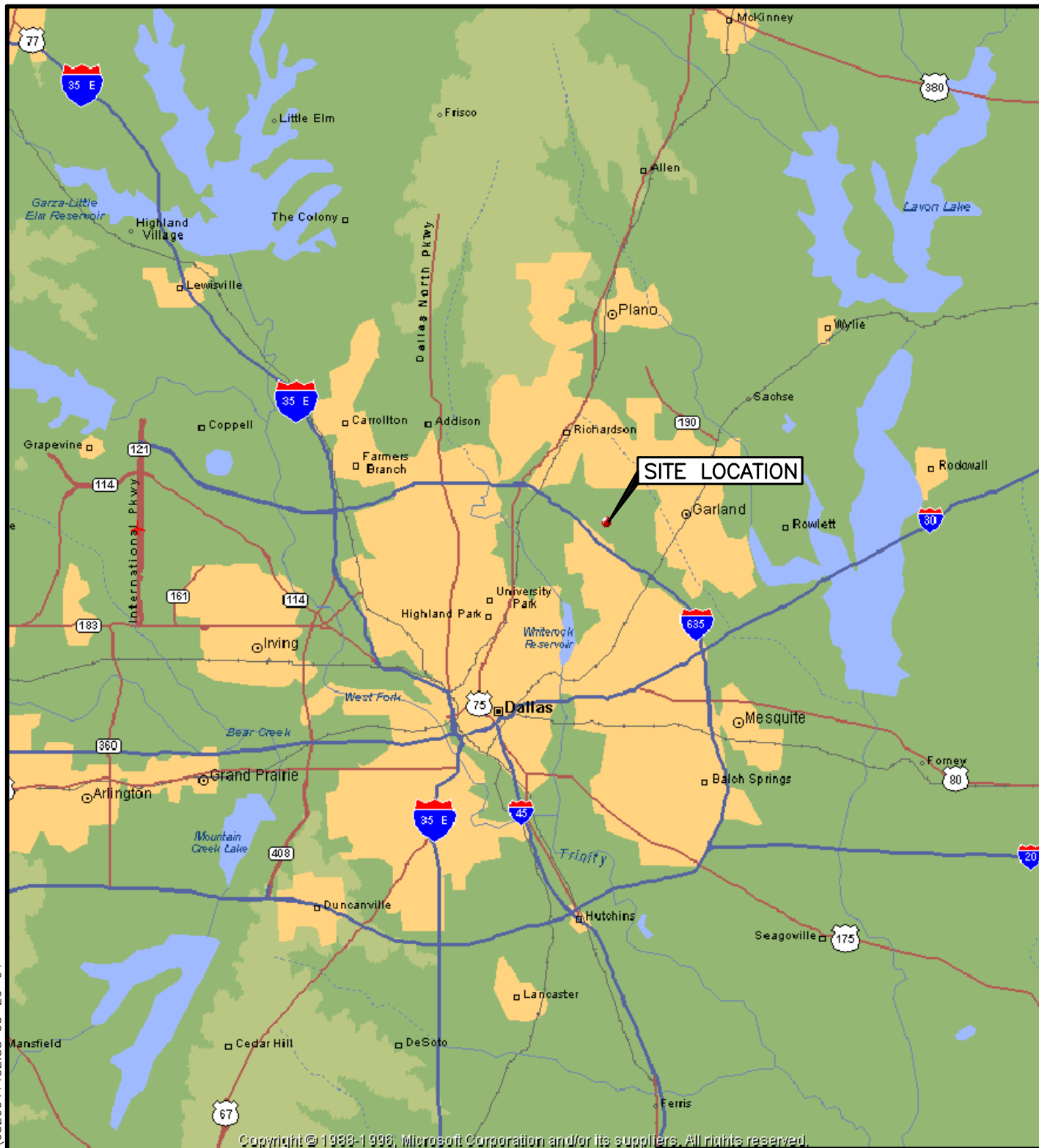
4. ACTIONS TAKEN

On 24 April 2004, START-2 members Danette Parnell and Heth Parnell mobilized to the incident site to perform a site investigation. START-2 members observed approximately six cleanup personnel from AMX and two vacuum trucks on-site. AMX was utilizing the vacuum trucks to collect the chemical-rainwater mixture in a stormwater collection area at the south end of the property. An earthen berm was constructed around the breach in the facility containment wall to prevent further migration off-site. The PRP cleanup contractor staged fractionation tanks on-site to store recovered chemical-rainwater mix for later disposal. After EPA OSC Greg Fife determined the cleanup process to be satisfactory, START-2 members were released from the site.

On 19 May 2004, START-2 contacted Andy Medina for a followup briefing. Andy Medina stated that Brenntag Southwest, Inc. had collected approximately 70,000 gallons of the chemical-rainwater mixture. The mixture was to be transported to a local disposal facility.

5. LIST OF ATTACHMENTS

- A. Site Area Map
- B. Site Location Map
- C. Photographs
- D. Copy of NRC Report No. 719757
- E. Copy of POLREP
- F. Copy of Logbook
- G. Copy of TDD No. 06-04-04-0013



US EPA REGION 6 START-2

ATTACHMENT A SITE AREA MAP

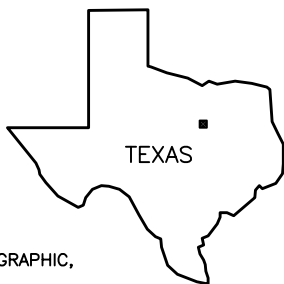
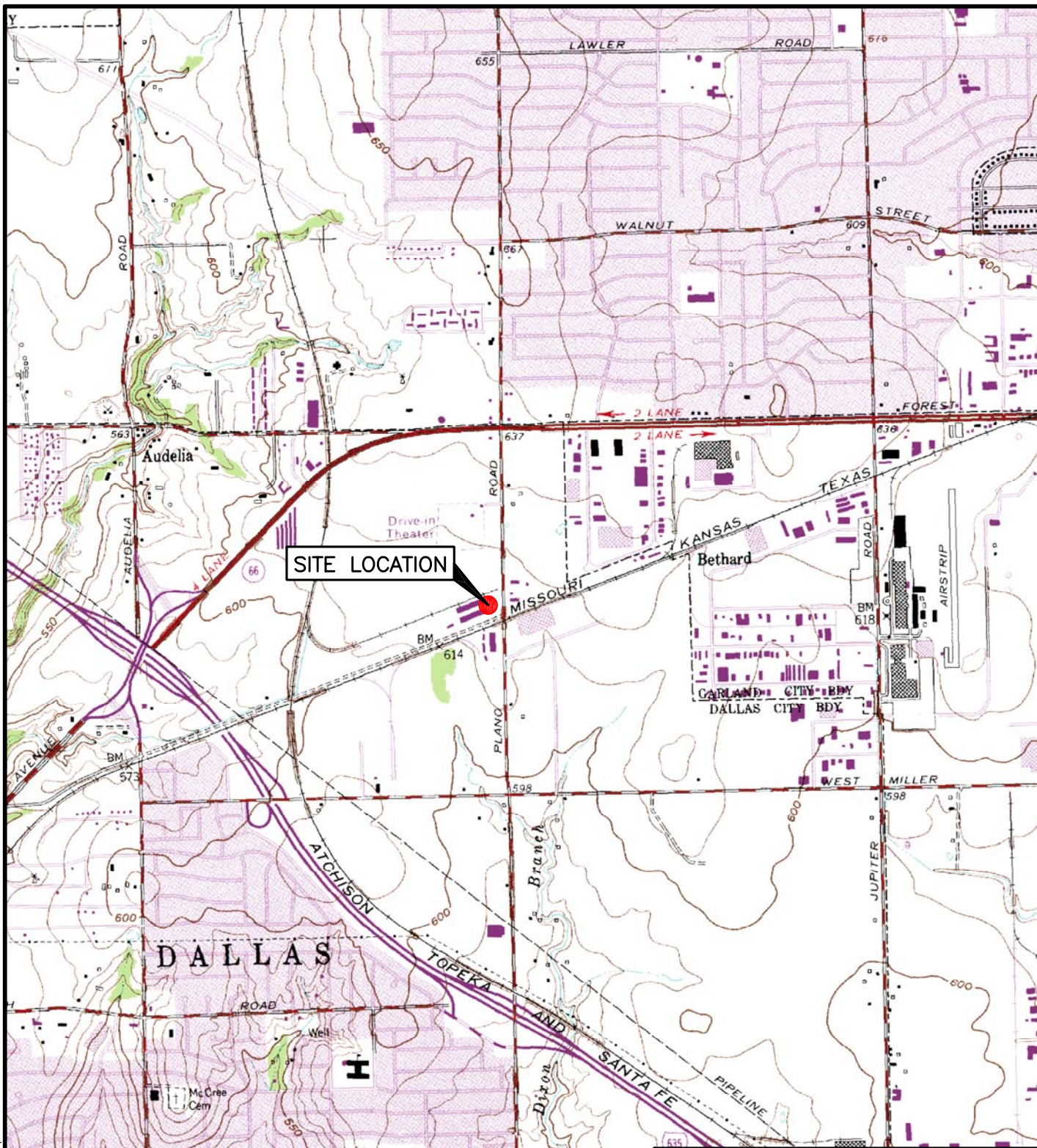
BRENNTAG SOUTHWEST
DALLAS, DALLAS COUNTY, TEXAS

NRC: 719757
TDD No.: 06-04-04-0013

DATE:
MAY 04

W.O. #
12632.001.300.0475

SCALE:
NOT TO SCALE



**US EPA REGION 6
START-2**

**ATTACHMENT B
SITE LOCATION MAP
BRENNTAG SOUTHWEST
DALLAS, DALLAS COUNTY, TEXAS**

DATE:
MAY 04

W.O. #
12632.001.300.0475

SCALE:
1" = 2000'

SOURCE: USGS 7.5 MINUTE SERIES TOPOGRAPHIC,
GARLAND, TEXAS.
NRC: 719757
TDD No.: 06-04-04-0013



T-11
cactus
TANK TRUCK SERVICE
807-444-1000
Dallas, TX

VIN: 1N4KLS9K7P8C43221

TANK DOT 005375822
35 PPG 10000
30% AC 70/30

2014 CACTUS TANK TRUCK
6-10-14 2-13-14 18-14 2-14 18-14

PRESSURE



CAUSTIC SODA 50%
UN 1824

CAUSTIC
SODA

UN1824





**HYDROGEN
PEROXIDE
50%**

UN 2014

STAR

CAUTION



**DRIVE IT SLOW
&
CARRY IT LOW**













NATIONAL RESPONSE CENTER - PUBLIC REPORT

Incident Report # 719757

INCIDENT DESCRIPTION

*Report taken by: MST3 ARSENAULT at 10:33 on 24-APR-04

Incident Type: STORAGE TANK

Incident Cause: CRIMINAL INTENT

Affected Area:

The incident was discovered on 24-APR-04 at 05:00 local time.

Affected Medium: LAND SECONDARY CONTAINMENT

SUSPECTED RESPONSIBLE PARTY

Name: JERRY HILL

Organization: BRENNTHE SOUTHWEST Address: 610 FISHER ROAD
LONG VIEW, TX 75604

PRIMARY Phone: (918)2464616 ALTERNATE Phone: (918)2458353

Type of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

11344 PLANO RD County: DALLAS City: DALLAS State: TX

RELEASED MATERIAL(S)

CHRIS Code: ACT Official Material Name: ACETONE

Also Known As:

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: EGL Official Material Name: ETHYLENE GLYCOL

Also Known As:

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: HPN Official Material Name: HYDROGEN PEROXIDE SOLUTION (>8%

Also Known As:

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: GLYCOL ETHER

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: METHYLENE CHLORIDE

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: NCC Official Material Name: NO CHRIS CODE

Also Known As: MINERAL SPIRITS

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: PTH Official Material Name: POTASSIUM HYDROXIDE

Also Known As:

Qty Released: 0 UNKNOWN AMOUNT

CHRIS Code: TOL Official Material Name: TOLUENE

Also Known As:

Qty Released: 0 UNKNOWN AMOUNT

DESCRIPTION OF INCIDENT

A TRESPASSER ENTERED THE PROPERTY AND OPENED SEVERAL STORAGE TANKS,

ALLOWING THE MATERIAL TO SPILL INTO SECONDARY CONTAINMENT.

INCIDENT DETAILS

Description of Tank:
Tank Above/Below Ground: ABOVE
Transportable Container: NO
Tank Regulated: NO
Tank Regulated By:
Tank ID:
Capacity of Tank:
Actual Amount:

DAMAGES

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES:

FATALITIES:

Hospitalized:

Empl/Crew:

E

Date: April 25, 2004
Subject: Brenntag Southwest Chemical Release, Dallas, Dallas County, Texas
From: Greg Fife, OSC, U.S. EPA, Region 6 (214-665-6673)
To: Ragan Broyles, RPB, EPA Region 6
Director, TCEQ

POLREP No.: 1st & Final

Event: Emergency Response
Site ID Nos.: NRC# 719757
Start Date: 25 April, 2004
Demobilization Date: 25 April, 2004
Site Type: Chemical Release
Site Latitude/Longitude: North 32.90335 Degrees/ West 96.70053 Degrees

I SITUATION

On 25 April 2004 at 0600 hours representatives from Brenntag Southwest Inc. reported a release at their facility located at 11344 Plano Road, Dallas Texas 75243 to the National Response Center (NRC # 719757). According to Brenntag representatives, vandals gained entry into their chemical distribution facility at an undetermined time during early morning of April 25 and released several chemicals including flammable solvents and oxidizers, creating a high risk of fire and explosion. Severe storms and heavy rain impacted the area during the night of the incident. The facility is located in an industrial area with a mass transit light rail line located directly to the south. No injuries or evacuations were reported.

The following chemicals were reported to be released: Hydrogen peroxide (50%), acetone, mineral spirits, toluene, ethylene glycol ether, potassium hydroxide, and methylene chloride. The quantity was undetermined at the time of this report.

II ACTIONS TAKEN

On 25 April, 2004, EPA mobilized to the incident location to conduct an investigation. EPA representatives met with PRP representatives. At the time of arrival the PRP cleanup contractors, AMX, was utilizing 2 vacuum trucks to collect the mixture of released chemicals and rain water. The chemical-rain mixture pooled at the south end of the property in a storm water collection area. PRP reported an undetermined amount of chemicals were released off site through a breach in the facilities containment wall. An earthen berm was constructed around the breach to prevent further offsite release. The chemicals released offsite flowed into a storm drain located to the south of the facility along the light rail right of way. The PRP cleanup contractor staged fractionation tanks on site to store recovered chemical water mix for later disposal.

III FUTURE PLANS

EPA will continue to monitor cleanup progress.

IV KEY ISSUES

No evacuation, no injuries occurred.

VI ATTACHMENTS

Digital Photographs (*.jpg files)

DSC0794: Valves that vandals opened

DSC0796: Containment area where chemicals pooled

DSC0798: Containment area where chemicals pooled

"*Rite in the Rain*"[®]
ALL-WEATHER WRITING PAPER



HORIZONTAL LINE

All-Weather Notebook
No. 391

NRC # 719757
Brenntag Southwest
12632.00 / 300.0475.01
TDD 06-04-04-0013

4 5/8" x 7" - 48 Numbered Pages

BRENNTAG

Clay Wade
Vice President of Operations

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2

BRENNTAG

Andy Medina
Operations Manager

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Voicemail: 800-945-4528 ext. 2774
Email: amedina@brenntag.com

INCHES

CONTENTS

RENCE

DAT

Clear Vinyl Protective Slipcovers (Item No. 30) are available for this style of notebook.
helps protect your notebook from wear & tear. Contact your dealer or the J. L. Darling Corporation.

4/24/04

06-04-04-0013

1145 START-2 members Darnette Parnell and Heth Parnell were contacted by EPA OSC Greg Fife of a response.

A chemical distribution company Brenntag Southwest of Dallas, TX released 8 different chemicals into a containment area. The cause was vandalism.

1230
1300 START-2 members conducted Site Safety Meeting.

Objectives - written/photo documentation, coordinate w/ officials

Physical Hazards - slip/trip/fall, traffic, lightning.

Chemical Hazards - oxidizers, flammables, corrosives

Weather - cloudy/raining, storms possible, mid 70's, light + variable winds

Allergies - Darnette P - None
Heth P - PCN

PPE - Level D

FTL Darnette Parnell

SSC Heth Parnell

1300 START-2 members arrived on site. Met w/ PRP Clay Wade

4/24/04

06-04-04-0013

214-341-0512. Clay stated at approx 0430 the alarms at the facility went off. At approx 0450 the first worker arrived and noticed valves had been opened and product was being released into containment area.

Heavy rains occurred during the night and into the morning - more is expected. Vandal had opened 8-7 different valves to different containers. Chemicals released: Hydrogen Peroxide, (50%), Acetone, Mineral Spirits, Toluene, Ethylene glycol ether, potassium hydroxide, methylene chloride.

Amounts are unknown at this time because the company uses old gaging method and only measures gages once a week. They will have to see what gages read a week ago and subtract amounts sold during the week.

1340 START-2 observed location on plant where all rainwater and chemicals were collected. Two vac trucks and remediation crews from AMX were on site removing product from

4/24/04

06-04-04-0013

containment and putting it into 500 gal tanks. The product will be tested and disposed off according to the results. Clay stated GC results showed liquid was 94% rainwater. 3,000 gal have been removed from the containment area so far. START-2 observed 2 cracks in containment where ~~pp~~ liquid was released off site. One location where liquid flows directly into a storm drain. Storm drain flows into Dixon Branch which flows into White Rock Lake. Remediation crews stopped leaks and at the time START-2 was on site product was no longer flowing off site. ~~QSP~~

1415 Clay stated police, FBI, Homeland Security, and state were notified as well as the companies near by -- no residential areas nearby. ~~QSP~~

NOTE: TCEQ Jim Kerlin was on site and departed before START arrived. He monitored for VOC's, but did not detect elevated levels. ~~QSP~~

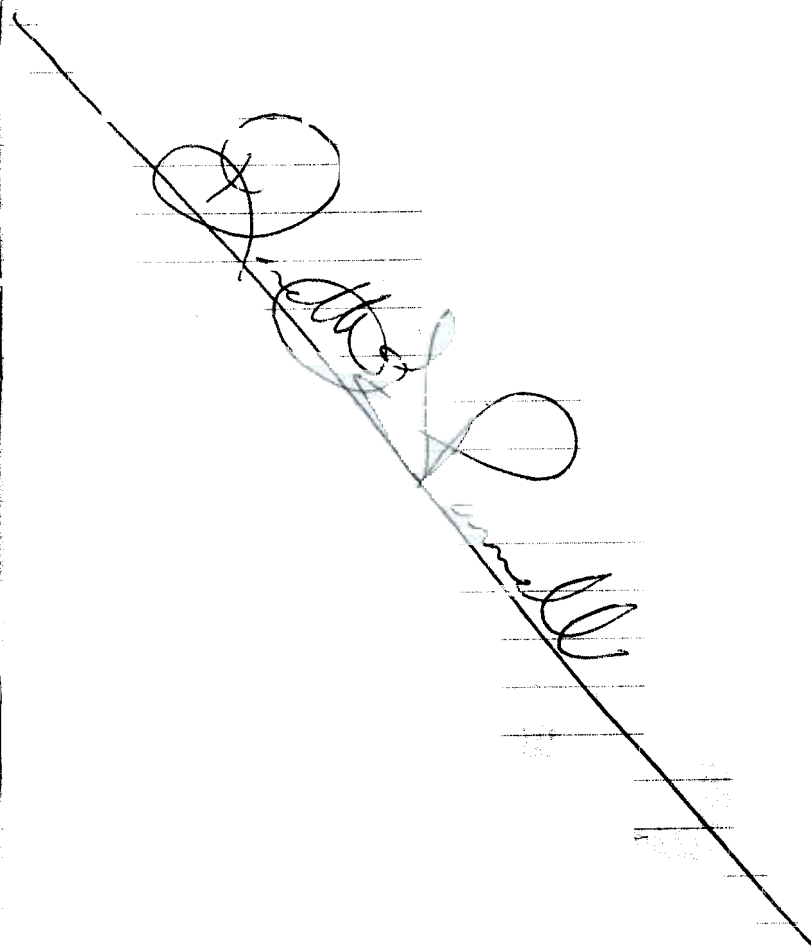
1445 START-2 contacted Greg Fife. No problems were discussed. ~~QSP~~

4/24/04

06-04-04-0013

1500 START-2 was released from site and departed site. ~~QSP~~

GPS Location of Incident:
32.90335 N / 096.70053 W.

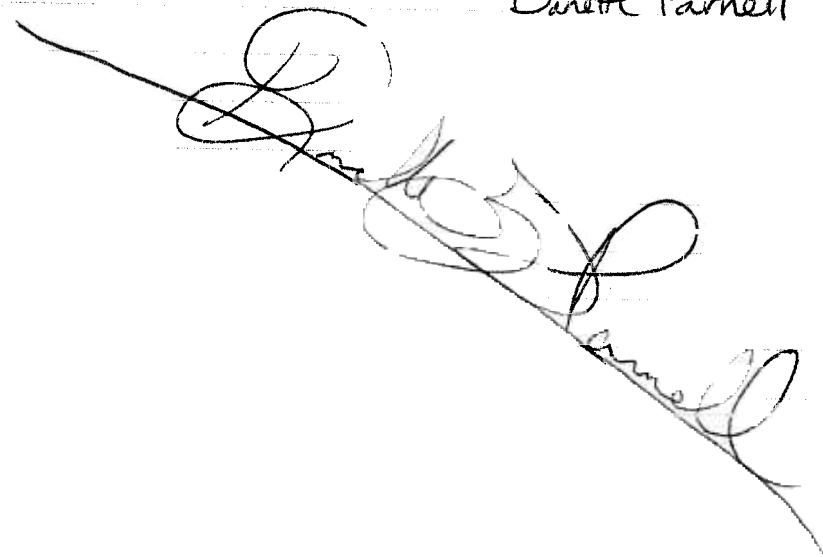


4/25/04
PHOTO Log

06-04-04-0013

Camera: Sony CyberShot:
RFW 24918

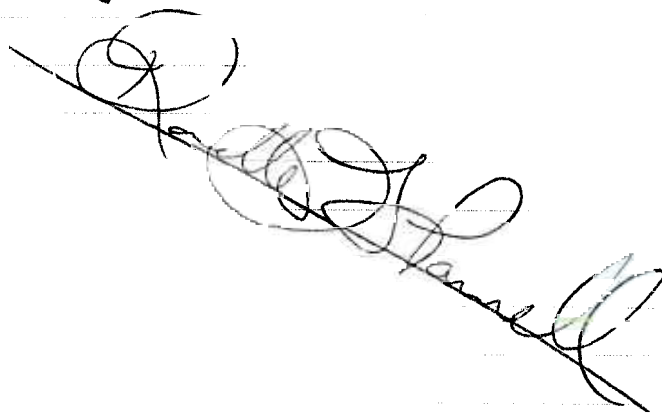
photo#	Date	Time	P/W	Direction	Description
101	4/24/04	1330	HP/DP	SW	Van truck removing chemical-waste
102		1335	HP/DP	W	caustic soda that was released
103		1335		E	Hydrogen Peroxide tank where release
104		1337		SE	valves that were opened
105		1341		W	Back of containment area - breach
106		1341		W	Breach in containment
107		1343		NW	containment area w/ product
108		1351		NE	containment area w/ product

P/W = Photographer/Witness - Heth Parnell/
Dorette Parnell


19 May 04

06-04-04-0013

1240 START-2 conducted a follow-up on the response. START-2 spoke with Andy Medina, the operations manager. He stated the approx. amounts spilled of the different chemicals were: acetone 5700gal, methylene chloride 5400gal, toluene 2400gal, ethylene glycol ether 3600gal, mineral spirits 1400gal, potassium hydroxide 930gal, hydrogen peroxide 1000gal. He stated a total of 70,000gal of the chemical-rainwater mixture were collected. The mixture will be taken to a local disposal facility. The investigation is still continuing.



END OF LOG



U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

START2
Technical Direction Document

Weston Solutions; Inc.

TDD: 06-04-04-0013
Contract: 68-W-01-005

TDD

Purpose: Work Assignment Initiation
Priority: High
Overtime: Yes

Period: Base Period
Verbal Date: 04/24/2004
Start Date: 04/24/2004
Completion Date: 06/24/2004
WorkArea: RESPONSE ACTIVITIES
Activity: Emergency Response
Activity Code: RV
Section of SOW: II.B.1
Performance Based: No

Project/Site Name: Brenntag Southwest
Project Address: 11344 PLANO RD
County: Dallas
City, State Zip: Dallas, TX
SSID: 0600 **CERCLIS:**

Authorized TDD Ceiling:	Cost/Fee	LOE
Previous Action(s):	\$0.00	0.0
This Action:	\$4,240.00	60.0
New Total:	\$4,240.00	60.0

Specific Elements - Collect facts regarding the discharge or release to include its source and cause, - Identify potentially responsible parties, - Analyze the nature amount and location of discharged or released materials, - Analyze the probable direction and time of travel of discharged or released materials, - Observe and document federal state and private actions taken to conduct a response action

Description of Work:

This TDD is under work assignment number 0300. NRC # 71957
START shall contact OSC Greg Fife.

Accounting and Appropriation Information

SFO: 22

Line	DCN	IFMS	Budget/ FY	Appropriation Code	Budget Org Code	Program Element	Object Class	Site Project	Cost Org Code	Amount
1	SCR078	AYW	03	TC	6AS0P	50102D	2505	0600RV00	C001	\$4,240.00

Funding Summary:

Funding

Funding Category

Previous: \$0.00
This Action: \$4,240.00
Total: \$4,240.00

CERCLA Pipeline

Task Monitor Section

Task Monitor: Greg Fife

Date: 04/27/2004

Project Officer Section

Project Officer: Linda Carter

Date: 04/27/2004

Contracting Officer Section

Contracting Officer: Tobin Osterberg

Date: 04/27/2004

Contractor Section